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Opportunities of the interior	15.165	Program	Program through the	/ / SAD CHANN						
Department of the interior	15214	Non-Sale Disposals of Mineral Material	To permit see use of certain mineral material	under juster						
Department of the interior	15222	Cooperative inspection	ROSE SOCIALY ecognized Thesis in acquaing and Tribal Securication Program through the instance in acquaing a securical securical and in acquaint and in acquai	Sam glwww. Sings: Hilps:						
		and Tabes	Management (BLM) to							
Department of the interior	15.224	Cultural and Paleontological Resources		https://https:/						
Department of the interior	15225	Recreation and Vision Services	The BLM makes if a profity to enhance	sang www. mps:/mps/						
Department of the interior	15.228	BLM FURS	access to the outdoors Wildland Fire Fuers	nings/mps/						
		BLM Fuels Management and Community Fire Associated Parentin Wild Horse and Burlo Resource Managemen	Management and Community Assistance Section of turbs	SARA WWW.						
Department of the inferior	15229	Resource Managemen	Management (BLM) manages and profests	sangwww.						
Department of the infecor	15230	invasive and Novous Plant Management	confinal and makes if a provision of the Charles of of	MARCO MIRRO						
Department of the inferior	15232	Jani Rie Saerce	Department of the This program continues to advance the administrationals in administrational in the administrational in the administrational in administrational in administration and the administration and	nips:/https:/						
Department of the interior	15.233	Program	Administrational Constant	Sang www.						
*	15283	Resource Managemen	Management (BLM) Forest and Woodland	sang www.						
Department of the interco	15.234	Secure Ruck Schools and Community Self-	Since its inflat passage in 2000, the Secure	imps/imps/						
Department of the interior	15235	Southern Nevaca Public Land Management				-				
Department of the infesor	15.238	Management Environmental Quality	Management Ad Management (BLM) Astragement (BLM) and its cooperative	SIFI O WWW.						
		and Protection	Ms ragement (BLM) and its cooperative	sang www.						
Department of the infenor	15.237	Rangeland Resource Management	The Bureau of Land Maragement (BLM)	https://https:/						
Department of the infeaor	15.239	Management in tairve	The Buseau of Land wa regement (BLM) and its cooperative The Buseau of Land wa regement (BLM) Rengeland or Become Experience of Buseau of Land wa regement financial To provide man orium makan patriopation in	inter judes,						
Department of the interior	15.241	indan Sell-	Ma regement financial To provide maximum	sang www. Imps://mps/						
		Determination Act Contracts, Grants and	inchan participation in the government and	Sang www.						
Department of the intercol	15243	Yourn Conservation Opportunities on Publi Lands	BLM36**s continued commitment to reduce and direams re-ris	imper/imper/						
Department of the interior	15244	Aquatics Hesources Management	196 BURSUTO* cand Astragementa € ™s	MARI MARIO						
Department of the infesor	15245	Plant Conservation an	Bufeau of Land We regerrent financial To provide maximum inclus parhopation in the government and BLASS "s continued commitment to reduce and desunitive to THE ESSESS Calculate Ass regerrents "s Appart Resources of the Bureau of Land	sangwww.						
		Management	Att ragementa 6 ** s	ran always						
Department of the interior	15:246	Threatened and Encangered Species	Bedocated Microsom The TAS Species Program has an important rote in This Valdine Program satilis the Department of the interior response This program area to increase the effectiveness of	https://https:/						
Department of the interior	15247	Wildlife Resource Management	The Widn's Program tutilis the Department	WAS MISSO						
Department of the inferor	15248	National Landscape	of the intercrivisions of This program aims to	sang www. mps://mps/		-				
		Conservation System	efectiveness of	SIR G WWW.						
Department of the interior	15.250	Regulation of Surface Coal Mining and Surface Effects of	to assign the States and These with active coal mong in administering I The cojectives of the Ananogred wire Langs	sangwww.						
Department of the interior	15252	A transcored Mine Land Reciamation (AMLR)	The cojectives of the Abandoned wine Lands	https://thtps:/						
Department of the inferior	15253	Not-tor-Proff AMD	(AML) Program are belong in the Surface The Not-los-Profit, acid	sang www. outail ireaco imps:/ https:/						
Department of the interor	15254	Reciamation PSWAVCTA	Anancored wire Lands [AML] Program are ornors in the Surface The Not-tos-Prost, Acid Mine Distringe [AMID] Recumanion The purpose of the	sang www.						
		AmeriCorps	OSMINE Youth Program IS to carry out The goal of the OSMINE Applied Soence Programs to develop	sangwww.						
Department of the inferior	15255	Science and Technology Projects	The goal of the OSMRE Applied Sperce	mps/mps/						
Department of the interior	15.406	National Park Service	The National Park	inter inter.						
Descriment of the intesor	15.407		The National Park Centerinal inflative is an effort to prepare The Keweenaw NHP							
		Historical Park (NHP) Preservation Grants	Preservation Grant paggram is interinded to facilities a rouse Charles The Renewable Energy Program oversees the leasing of areas on the	SID WWW.						
Department of the infesor	15.408	Bureau of Ocean Energy Management Denoscrate Energy	The Renewable Energy Program oversees the	https://tttps/						
Department of the interior	15.421	Alaska Coastal Manne								
Department of the intercol	15:423									
		Ereigy Management (BOEM), Environments	The Bureau of Ocean Energy Management (BOEM) provides major	Sang www.						
Department of the interior	15.424	Manne Unerats Admiles	BOEM provides first roof assistance to quarried partiers to 15 ensure that as oil,	sangwww.						
Department of the inferior	15.427	Federal Oil and Gas Royally Management	15 ensure that all oil, gas, and sond minerals	impar impar						
Department of the interior	15.429	Royally Management State and Tabal State Select	gas, and sond innerals originated on the public ONRR shares 90	sang www. https://tmps/						
			ONRR shares 90 percent of oil and gas royalties with the Share	Sang www.						
Department of the interior	15.430	eigi state Coastal Zor	e CNRR shares 27 percent of mineral leasing revenue derived	sangwww.						
Department of the interior	15:431	Alaska Settlement Agreement	percent of triental leasing revenue derived ONFF shares 100 percent with the State of Alassa, to be good morbinations for Late CNFF shares 4087 percent of OI and Gas Finits, Royaltes, and	Imps / Hitps:/						
Department of the interior	15.432	Cantonna Retuge Account	ONTH Shares 40.57 percent of Oil and Gara	under under						
Department of the interior	15.433	Flood Control Act I No		sang www.						
			percent of mineral leasing revenue with	sangwww.						
Department of the infesor	15.434	Geotternal Resource	CAUDO charge 50	https://https://						
Department of the interior	15.435	GOMESA	percent of intrinsial leasing revenue with the bittle, and the CONPR STANCE 37.5 percent of selected revenue with Gut	mps/mps/						
Department of the intenor	15.436	Late Disbursement interest		sam g www. https://https:/						
	15437		disbussement into lest on subject payments made in some after the As directed by the	1 1						
Department of the interior		Minerals Leasing Act	Minerals Leasing Act.	san g www.						
Department of the interior	15.438	National Forest Acquired Lands	CNAN STARS 25	migsty migsty						
Department of the interior	15.439	National Petroleum Reserve - Alaska	ONRY shares 50 percent of NPR-A of	sangwww. mps/mps/						
			percent of NPR-A of and gas mineral lessing							
Department of the interior	15,440	South Half of the Red Pives:		imper/imper						
Department of the interior	15,441	Safety and Eneronmental Research and Data	The Bureau of Safety and Environmental Enforcement (BSEE)	https://https:/						
Department of the interior	15.442	Plesearch and Data Alaska Native Spence and Engineering	Enforcement (BSEE) The Buseau of Satety	sang www.						
Department of the inferior	15.443	and Engineering Not For Profit	The Bureau of Safety and Environmental Emolyperiem (BISEE)	sang www.						
			The Bullian of Ocean Energy Management (BOEM) provides trajor	sang www.						
Department of the interior	15,444	Take Fade	The Bureau of Ocean Energy Management	mps:/mps/						
			(BOEM) provides major	SAM WWW.						

Department of the infenor	15.504	Water Recycling and Destination Destination Programs recycling and Destination Programs (explicit programs)	https://https:/							
Department of the interior	15.508	Water Destination These size three goals of the program (1) Development augment the supply of	sangwww. mps://mps:/							
		Research and for the program: (1) Development augment the supply of	Sam g www.							
Department of the interior	15.507	Development augment the supply of WaterstanAPT (Sustain To provide cost-shared and Alorage sinding Solvanous Americals "S Mpss of water Securities by March as Providing March as an angloo has been	nmps://mps/							
Department of the interior	15.508	Providing Water to Al-	SATIGNAMA. Out of Interes							
Department of the interior	15.509	Terminal Lakes projects expected	Sangwww.							
Department of the Interior	15.509	and No.rege Special Serving Drivanious Serving Driva	mps/mps/							
Department of the infence	15.510	Colorado Ute india.n To supply municipal an	d https://https:/							
	15.511	SettlemetriAct to the Use Mountain	Sangwww.							
Department of the interior		Water Fight: Cuttons Resourced Resourced Cuttons Resourced Resourced Cuttons Resourced Resour	sang www.							
Department of the interior	15.512	Central Valley The purposes of the improvement act. Title	mps/mps/							
Department of the inferior	15.514	Reciamation States Funding under the	sang www.							
		E resigency Drought Drought Response Relief Program will be	Sangwee.							
Department of the interior	15.518	Fort Peck Reservation To ensure a safe and Rural water System adequate municipal.	Milps:/ Hitps:/							
Department of the infence	15.517									
		Cookinstion Act assistance, through grants or cooperative	Sangwww.							
Department of the interior	15.518	Gastoon Deeston Living Gastoon College Gastoon Colle	hinter (hitter)							
Department of the interior	15.519	INDA IT TIDAL WATER TO INCIDENCE	Imps/Imps/							
		Development, titbes to develop, Management and marke and others	SARIE WAY.							
Department of the intercol	15.520	Water System accounte municipal, nated and including	https://mps/							
Department of the interior	15.521	Lower Rio Grande Awards will be made to	mpc mpc							
Department of the inferior	15.522	Conservation and opportunities to improve	e sangwww.				-			
maps on the SMODY		Vately What Resource investigate and commit opportunities to improve Mm Woom Rural Water To ensure a stea and Supply Phoject and adequate managers.	SIR g www.							
Department of the interior	15.524	Recreation Resources To provide cost-share opportunities with non-	hibes hibes							
Department of the intenci	15.525	Pec reation Resources To provide cost-share option unless with non- rected recession. Rocky Boy s/North To ensure a sare and	sang/www. mps/mps/			-				
		Dennal Montana adequate rural, Regional Water System municipal, and industri	sang www.							
Department of the interior	15.526	San Gabe of Basin To design, construct, Pestoration operate, and maintain	mps/mps/							
Department of the interior	15.52V	DOWN for Wheth Command and the	u RAGET HAGES				-			
		San Juan River Basins of Reclamation to Endangered Fish provide cost sharing to	sangwww.							
Department of the inferior	15.590	Water Conservation The goal of the Water Rield Services (WCFS) Conservation Field	mps/mps/							
Department of the interior	15.531	Yaluma River Basan Water Frontier Per	cutati inten in https://https:/							
Department of the missor	15.532	[YREWE] BISST (1) to protect, migate, and entance	sang www.							
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Department of the interior	15.533	Canomia water The purpose of the	mps:/mps/							
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		Upper Col cordo Priver Bish Fish and Widther A Requests provide An Request Service An Request An Requ	sangwww.							
Department of the interior	15.537	Middle Ro Grande The Middle Ro Grande Endangered Species Endangered Species	mips/imps/							
Department of the interior	15.538	Collaborative Collaborative Program	San g www. out all justice. https://https:/							
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Department of the interior	15.539	Acquire 1 Storage the City of	/ Imperimper							
Department of the interior	15.540	Late MeadLas Vegas The objective of this	mps:/mps/							
		Late MeditLas Vegas Wash Wash Document State Docume	Sang www.							
Department of the interior	15.541	Add of 1958 Basin Project Act of								
Department of the interior	15.542									
		Settlement ACT of 2004 Water Settlements ACT of 2004, the Secretary of the interchases	SATION WANTED							
Department of the inferior	15.543	A 2000 Pages Settlement Act of 2009 Settlement Act of 2009 Later Taboe Regional Wellands Development Plate River Recovery Implementation Plate River Recovery Plate River River Recovery Plate River River Recovery Plate River River River Recovery Plate River Rive	https://ttps:/							
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Department of the interco	15.546	Implementation Plate River Recovery Program Cooperative	Sangway.							
		Yourn Conservation Promote and stimuste public purposes such a education, job training.	S / / Sangwww.							
Department of the interior	15.590	FISH-ABLE Fun with To provide a poonunite Reclamation for disabled and	s imperiment							
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		and construct notices	Sandwww							
Department of the infestor	15.553	Eastern New Meaco Provide polatile surface Rural Water System water to communities i	e https://tttps/							
Department of the interior	15.554	Eadem New Melaco Rissal Water System Easer New To communities in Easer In New Communities in Co	inter inter							
		Management WaterStatART Cooperative Watersher	sang www.							
Department of the interior	15.565	San Joaqun River The objective of the Restoration San Joaqun River	mps./Mps/							
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ways and a second	13.33	Tribe Rural Water Mountain Apacte Tribe System Water Rights New Mesco Rio Renabilitate and repair	SID Q WWW.							
Department of the interior	15.559	New Mesco Rio Renabilitate and repair Grande Basin Pueblos Intoation introduce	mps/mps/							
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1.		SECURIE VIAIR AL ACT TO fund research Presearch Agree ments designed to conserve Susum Marsh Preservation Agreement the Department on the interest in the State	SIR g www.							
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A		Congenization Support for activates to perfect received and support for activates and perfect received and support for activates and perfect received and perfect receiv	san g www.							
Department of the missor	15.585	implementation of the TTE Claims Resolution Tacs Pueblo inclain Act of 2010 was signed water agms settlement into taw on December	mps / tmps/							
Department of the infenor	15.566	Upper Klamath Basin 15 plan, implement, an Water Supply Alignment administer programs to	a trips/ trips/							
20		water Supply Alignment administer programs to align water supplies ar other for uncertainty	www.p.mca.b							
Department of the interior	15.567	Sign water suppres an American State of This program supports Conservation Prior Conservation Prior Conservation Conserva	mps/mps/							
Department of the infence	15.569	Educational Outreach The Water Education Foundation has developed several	https://https:/							
Detarined of the infect	15.570	developed several	Sang www.							
		Bay Detta Restoration The CALFED Water Use Discussion Grant program promotes	importings/ sang www.							
Department of the interior	15.571	Saton Sea Program CGGCVeS CYTES program are to develop and implement	metal impar							
Description of the inferior	15.572	ACRECITION VOICE USE The coverage of the	sang www.							
		Agricultural Water Use The collective of the Efficiency Program Agricultural Water Conservation Efficience Conservation Efficience Conservation Efficience	SIRGWWW							
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Department of the interior	15.574	Mailer Strange Entrancement Special Parks (1997) Water Stranger (1997) Pergection (1997) Special Parks (1997	ec https://https:/						
Department of the interior	15.576	Yasana River Basan To fund grants or	MGC MGC						
		Phase III (Valuma Basin for the purpose of	nd sangwww.						
Department of the mesor	15.577	Projects planning, design, or	or imperimper						
Department of the interior	15.580	Aguatic Ecosystem The objective of the	unter unter-						
Department of the interior	15.805	Restoration Program	nis sangwww.						
Department of the street	15805	tunds support activi	NS / /						
Department of the interior	15,508	Fish and Aquatic Details vary by	https://https:/						
Department of the interior	15:011	invasive Species summation provide	Sangwww.						
1 22	10011	Basic Humer Education Whildre Restoration and Sarety provides grants to	sangwww.						
Department of the interior	15.514	Beth and against Contesting of the Part of the Contesting of the Part of the Contesting of the Contest	We Impa/mps/						
Department of the interior	15.615	and Restoration coastal States for more awards with con-	SATIO WWW.						
		Conservation Fund Conservation Fund	Sangwww.						
Department of the interior	15.616	Clean Vessel Act This program provi funding to States, 1	es imps:/mtps/ e / /						
Department of the intercor	15.619	District of Columbia Rinnocetos and Tiger Conservation Fund Allican Depthyni Conservation Fund Aprican Depthyni Conservation Fund Aprican Depthyni Conservation Fund Aprican Depthyni Conservation Fund Conservation Fund Aprican Depthyni Conservation Fund Aprican Depthyni Conservation Fund Conservation	mps/mps/						
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Department of the interior	15.621	Asian Exemant To provide manga Conservation Fund assistance to supp	neps/reps/						
Department of the interior	15.622	Sportishing and This program provi	m sangwww n was usen es mos/mes/						
		Sportishing and This program pion Boating Stately Act District of Columbi North American To providing 2011	e / sangwww.						
Department of the interior	15.623								
Department of the infetor	15.626	westances Conservation Fund Enhanced Hunter Education and Safety Enhanced on the enhancement of the	es https://https:/						
		enhancement of h	ter sang www.						
Department of the inferior	15.628	grant Grant University of the Conservation This program picts funding to sport to and wedness restore	on samgwww.						
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Department of the interior	15.690	tor the effective for	sang www.						
		and financial assis to partners to	nce / sam g www.						
Department of the interior	15 831	Multistate Conservation (1) to Multistate Conservation (1) to State Co	or WAS HARS						
Department of the interior	15.634	Spie Widte Gords The roman rumo	of https://https:/						
		[SWG] Program is	sang www.						
Department of the inferor	15 835	Heorispical Migratory Bard Conservation Aussia: Subassence To assist in the conservation of nectropical migratory Aussia: Subassence To identify and pro-	https://https:/						
Department of the interior	15.636	Alaska Subsistence To identify and pro- Management information needer	oe NAC HIGO						
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		Migratory Bird Jorn The objectives project had protein	of / / sangwww.						
Department of the interior	15.639	Megatory Brid Joint The objectives of II Ventures project in are to sup- projects that protein Communication of the objective set of the Support II for Operating the Communication of Imprementation	under under						
Department of the interior	15.640	Late America and The mission of the Cas bean Regional America Regional	sangwww. ann mps/mps/		-				
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Department of the interco	15.645	Manne Turtle This program and Conservation Fund Manne Turtle and	~ NAC HIGH						
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Department of the intercol	15.547	Migratory Bird To maintain and Conservation entance population and fabrillas of	SATIONOM						
Department of the interior	15.648	Central Valley Project To protect, restore, improvement Act enfance tist, wild	ing interimper						
Department of the infesor	15.651	Central valley Project To project lestone enfance fail, wild and associated fail Central Africa Regional The Central Africa.	nas san g www. https://ntps:/		-				
		Invasive Species To encourage contractive and invasive Species To encourage contractive and invasive Species To encourage contractive and invasive Species and To Improve	San g www.						
Department of the infestor	15 652	Invasive Species To encourage coordination and	https://https:/						
Department of the intercor	15.653	National Outreach and To improve Communication communications w	** SHOET HIGHS						
Department of the inferior	15:504	Communication communications w	1 / /						
Department of the intercol	15.554	National Wildlife Retuge To provide lectring. System Enhancements to destiny, consent	nce / /						
Department of the interior	15.555	Micratory Bird Working with other Midratory Bird Working with other Midratory Assessment consense, while no	to imperimper						
Department of the interor	15 657	Moratory Brd Midmonto, Assessment conserve, emano- and conservation better understand Endangered Species Recovery	e sangwww.						
		implementation provide tederal line	CIN SANDWWW.						
Department of the interior	15.658	Natural Resource The purpose of the Durrage Assessment Natural Resource and Resource Damage Assessment	https://thps:/						
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Department of the interior	15.661	Compensation Plan losses of itsh and	mps./Mps/						
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Department of the intercr	15.663	NEWF-USING Participants	sang www.						
		Conservation Individuals, govern	Per Campus						
Department of the inferior	15 664	First and Widtle The FWS establish Coordination and this assistance be used: 1) tempor	d mips/imps/						
Department of the interior	15.665	Assistance be used: 1) fempor for cost displayed National Wetlands Emergency Wetlar Inventory Resolves Act -	ny sangww. outsi uroco s inpe/inpe/						
		National Wetlands Emergency Wetlan Inventory Personnel Verlands	Sam g www.						
Department of the infector	15.000	Endangered Spages To provide federal	hinps://hips/						
Department of the interior	15.007	Livestock Loss incertaint incredibility results in Contrarration and incredibility results Highlands Conservation To and natural resources and	mps./mps./						
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preparation of the IMMOI	15.008	Coastal impact The USFWS is no Assistance longer making awa under this program	25 / / The same www.						
Department of the interior	15.669	Cooperative Landscape The Collaborative	neps://reps:/						
Department of the interior	15.670	Conservation programmer an inches	m sangwww.						
		Wilding Service	SIT G WWW.						
Department of the inferior	15 671	Yukon River Salmon The U.S. Fish and Plesearch and Wildline Service	https://https:/						
Department of the interior	15.674	Management (Service) receives National Fire Plan- To implement the	nds samg www.						
		Weldland Urban Nanonal Conesive imenace Community Wildland Rive							
Department of the interior	15,676	Pount Edgagement To provide suppliers Education, and education, and employment Humanner Standy To provide rectines. Disable Relet and financial assistant Advites FIMS Colleging protecting.	ial. Imps://mps/						
Department of the infetor	15 677	Humcane Sandy To provide technic. Disaster Reter and financial assis	mpc/mpc/						
200		Disaster Relief and financial assist Admites PWS to identify, picked, constant Principles	nce / / www.						

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Marche M	Department of the interior	15.678	Cooperative Ecosystem The Studies Units Eco	Cooperative system Studies	https://https:/						
March Marc	Department of the interior	15 679	Contains Widne The	goal of the grant	mpe i mpe						
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March Marc	Department of the interior	15.680	Mexican Worl Recovery 10 p	rowcie tederal nout assistance to	Imper/imper/						
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March Marc		/* mo	309	cultiste in the	SIT g www.						
March Marc	Department of the street	10062	Experiences services not won	I with select NOOs	/ / SAD OWNW						
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Section Sect	Department of the interior	15.665	National Fish Passage To P and	estore native tish other aquatic	mps/mps/						
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Marchester Mar	Department of the intesor	15 887									
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			and and	other interested	Sang www.						
	*	15.089	Fund-Asia 355	stance for projects the effective long-	Sang www.						
	Department of the intercol	15,690	Rhinocetos Pro- Conservation Fund-	vide financial stance for projects	impairmpa/						
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			Historic Site Nico	xiemus, in Kansas, national	SITE WWW.						
Mathematical Math	Department of the infestor	15.805	Assistance to State 15 p Water Resources sup	port to water	mps://mps/						
Marie Mari	Department of the infetor	15.807	Earthquake Hazards To s	upport earthquake	https://https:/						
Marie Mari			r rogram Assistance haz	nong in order to	Sang www.						
Marche M	1.	15.808	U.S. Geological Survey To s Research and Data com Collection I For	upport research plementary to SS program efforts	sangwww.						
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Department of the Treasury	TC:118	Employer provided child 0 care exclusion s	der the baseline tax						
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Department of the Treasury	TC.121	Acception credit and The accusion Security Secur	e baseine tax						
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Department of the Treasury	TG.132	Medical Savings U	der the baseane tax						
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Department of the Treasury	TC:135	Refundable Premum T Assistance Tax Credit S	e baseine tax steri would not allow						
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Department of Trunsportation	20.824	Cable Security Reel The CSF helps sustain a feet or cable vessel; adve, commercially Tanker Security The CSF helps sustain a feet or cable vessel; adve, commercially Tanker Security The Tanker Security Program [Fig. 48]	https://https:/								
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Department of Veresars Alfaus	64.034	Program VA Grants for Adaptive Sports Programs for Displayed Veterans and equipe adaptive sport veterans Trainspontation. This program turties Program This program turties mission by editabilities	nmbs:/ nmps/								
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		Monthly Assistance health and to motivate Allowance Program encourage and sudain	SATIO WWW.								
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Department of Veterars Attains	64 055	Statt Sergeam Parker 10 provide resources Gorson Pox Surcite 10 provide resources Exwest community- based surcite	mpc mpc / sang www.								
Department of Veterans Attaus	64.056	Legal Services for To provide legal services grants to published and non-profit pevide	mps/mps/								
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Department of Veterans Attains	64.104	Balai Expenses Allowance for Veterans Service Colber 1, 2024, Wall provide a Pension for Non- Service-Connected Userania for Veterans Pension to Veterans Pension to Veterans Pension to Veterans To assist warning Userania for Veterans Pension to Veterans To assist medium To assi	sang www. mps:/mps/								
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Department of Veterars Artists	64.105	Specially Adapted To help certain severel Housing for Disabled disabled venerars Veterans acquire a home which	/ If the state of								
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очни всин и туским меда	04.114	Veterans Housing To asset wherans, Guaranteed and certain sensor insued Loans personnel, and certain	SIRG WWW.								
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Department of Veterans Atlans	64.116	Veteran Readiness and To provide all services Employment and assistance excession to enable	mips:/ https:/						
Department of Veterans Attaus	64.117	Survivors and 10 provide educations	MATERIAL PROPERTY AND ADDRESS OF THE PROPERTY ADDRESS OF THE PROPERTY AND ADDRESS OF THE PROPERTY ADDRESS OF THE P						
Department of Veletars Attains	64.118	Veterans Housing To provide venerars Direct Loans for Certain who are eligible for a	mps:/mps/						
Department of Velecans Atlaus	64.120	Post-Wetnam Eta. To provide educational	sang www. outst urses. inter/mps/						
	64.124	Assistance entering the Armed	sang www.						
Department of Veterans Attaus	64.124	EXCLEMENTAL ASSESSION CO. PROPRIESTA FORMATION TO PROPRIESTATION	mips:/mips/						
Department of Veterans Atlaus	64.125	Vocational and To offer vocational and	https://https:/						
		for Servicementers of Service members of Service members	Sangwww.						
Department of Veterans Altons	64.126	Native American Veteran Direct Loan To provide direct loans to derian veterans who	huber puber						
Department of Venezins Attains	64.127	Monthly Allowance for To provide financial	mps:/mps/						
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Department of Veterans Attains	64.130	Veteran Rapid The Veteran Rapid Bertannon accustonce Bertannon accustonce	mpc/mpc/						
Department of Velerans Affairs	64 20 1	Program Progra	sangwww.						
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Department of Veterans Atlaus	64.202	Procurement of Provide Government Headstores and Introduced headstores	haber haber						
Department of Welerans Atlants	64.203	Waters and/or and markers to mark Veterans Cemeters To assure States and	sang www. mps/mps/						
		Grants Program teclerally recognized total governments in	SARIG WAY						
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Department of Veterans Attains	64:205	VA Caster or Um To provide a more tary	mps mps						
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Environmental Profection Agency	66.001	ar Polition Control The objectives of the	hiber hiber					-	
Environmental Protection Agency	66.032	Aur Pollution Control Program Support Agrico program are to assist state, inclu. State and Tabla incloor EPA assists states and	SID g WWW.						
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Environmental Protection Agency	66 033	Radon Gornis Radon Gornis Received intelligence of the control o	Imper/imper						
Environmental Hosection Agency	66.034	Commission (OTC)	sangwww.						
		Properior assistance ising are to investigations, tund surveys, research interestings, Training To provide, interestings.	Sangwww.						
Environmental Protection Agency	66 037	infemships, Training 15 provide, infemships, and workshops for the Training Workshops	mps/mps/						
Environmental Profection Agency	66.038	Inferios Day, Training words, (recently, frame) and workstops portion promotion frames, which is also workstops and workstops an	Sam g www.						
1011 0		and Special Purpose recognized indian Activities of Federally—Titles' efforts to	sang www.						
Environmental Protection Agency	66.039	Diesel Emission The Diesel Emissions Reduction act (DERA) Reduction act, 42	WAC MIGED						
Environmental Protection Agency	86,040	National Grants U.S.C. 16132 et seq., Diesel Emissions The Diesel Emissions	sangwww. mps/mps/						
		Reduction Act (DERA) Reduction Act, 42 U.S.C. 16131 et seq.,	Sang www.						
Environmental Protection Agency	66.042								
Environmental Profection Agency	66 044								
		Community Buildings recognized Tribes, claim Fredian recognized Tribes, claim Fredian	Sang www.						
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Environmental Protection agency	66.946	Climate Pollution EPA is providing grants Reduction Grants to States, Locals,	WAC MIGRO						
Environmental Protection Agency	66.947	Pedestry Recognized	sang www.						
Entitlemental Protection Agency	00.047	Hydrofluorocarbon Pecciarn and innovative Destruction Grams Act (powded EPA with	/ / /						
Environmental Protection Agency	66.048	Greenhouse Gas and EPA is providing grants Zero Emission Chi-road to support state	imper/imper						
Environmental Protection Agency	66.049	Greenhouse Cas and EPA is providing grants zero Emission Chindeal R support state woose Source governments that are Grean Heavy-Buty Section 60101 or the	sangwww.						
		Venides Program intation Reduction Act of 2022 [or (RA)]	sang www.						
Environmental Protection Agency	66.051	Venides Program Gran Ports Program Clean Ports Program Section 60102 of the mission Records for Section Act of Section 1997 Betting Communities Grant Program Communities Grant Programs 3.	https://https:/						
Environmental Protection agency	66,110	Healthy Communities The Healthy	san giwww. RMGC MRGSO						
		Grant Program Communities Grant Programs a	sangwww.						
Environmental Protection Agency	00.121	Geographic Programs - Puget Sound has been Puget Sound Protection designated as one of 2st and Resposition: Tribal galaxies of National	https://https:/						
Environmental Protection Agency	00.123	and Restoration: Thital estuanes of National Geographic Programs - Puget Soundhas teen	STATE WAY,						
Environmental Protection Agency	66.124	Geographic Programs - Puget Sound action - Designated as one of 3 Agenda: Technical estumes of National Geographic Programs The EPA Region 6	sang www.						
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Environmental Profection Agency	66.125	Geographic Programs - The purpose of the	https://thtps:/						
Environmental Protection Agency	66.126	Late Pontchartrain Gean Water Act Basic Restoration Section 121 (33 U.S.C.							
	00.120	Geographic Programs - The goals of the SF Bar San Francisco Bay Hersbatten Program Water Queliny (crimally SF Bay Grant Geographic Programs - To develop and support Southeast New England the Southeast New	Sangwee.						
Environmental Protection agency	66.129	Geographic Programs - To develop and support Southeast New England the Southeast New	mps/mps/						
Environmental Protection Agency	66,130	Coastal Watershed England Program Revolution Program Geographic Program Geographic Program The prinsity objective of this programs to Plestoration Council disbusse funds to	SATI glwww.						
		Guil Coss Ecosystem this program is to restoration Council cassusse tunds to Congressionally 15 implement special	Sang www.						
Environmental Profection Agency	66 202	Mandated Projects Congressionally mandated spending for	10067/10067						
Environmental Protection Agency	66.203	ma related spending for Environmental Finance The Environmental	sanglwww. mps/mps/		-				
20.0		Environmental Finance Center Grants Center Grants Finance Center Grant Fringiam provides Multipurpose Grants to Multipurpose Grants to Multipurpose Grants to Multipurpose Grants States and Tribes Multipurpose Grants Multipurpo	Sang www.						
Environmental Protection Agency	06.204	Multipurpose Grants to States and Tribes (MPCs) are intended to	nnps/(mps/						
Environmental Protection Agency	66.305	Compliance Assistance Since 1996, in	https://https:/					-	
		the Regulated inclusing associations, Committee and Other imperities and other	Sam g www.						
Environmental Protection Agency	66.305	Colaborative Problem - Astroc Colaborative Problem - Pro	san always						
Environmental Profection Agency	66.309	Support to Services to pannessing win the Regulate of Committee and Com	mpc) mpc)						
	66.312	and Special Purpose support of surveys,	san g www.						
Environmental Profection Agency	66.312	Environmenta stance The purpose of this	miles miles						
Environmental Protection Agency	06.313	Government (E/G2G) popular is to support infernational The primary purpose or this programs to Comparace and Entorcement Projects support projects that	inter lunes						
Environmental Protection agency	60.418	Entorcement Projects support projects that	Sang www.						
Account of the Control of the Contro	W#18	Ocustruction Grants for TO assist and serve as Washewater Treatment Works on struction of	SID OWN.						
Environmental Protection Agency	66.419								
Environmental Profession Agency	66.424	State interstate, and including terrores and Tribal Program Support the District of Support Surveys Studies (% Support	sang www.						
		Survey, Susues, To Support of Sup	sang www.						
Environmental Protection Agency	66.432	State Public Water The cojective of these System Supervision assets in normalis	mpa/mpa/						
		System supervision grants is to provide financial assistance to section by the case.	SING WWW.						

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Environmental Profection Agency	66,433	State Underground To fooder development water Source and implementation of underground repetion Surveys, Studies, 100 support the investigations, containation and Demonstrations, and acceleration of	https://https:/					
Environmental Profection Agency	66.436	Surveys, Studies, 10 support the	mga" (mga)					
Environmental Protection Agency	00.437	Demonstrations, and acceleration of	SIR g www.					
Environmental Protection Agency	96.437	Becam Stand Sound Program (1)	imperimper /					
Environmental Protection Agency	66.441	Healthy Watersheds To support strategically Consolitum Grant protecting related	mps (mps/					
Environmental Profection Agency	66.442	Program safersheds across the Water infrastructure The objective is to	San g www.					
		Depondenance, and George Line of the Congress	sang www.					
Environmental Profession Agency	66.443	Reducing Lead in The grant program Danking Water (SDWA tunds activities to	https://https:/					
Environmental Profection Agency	00.444	Young ty School and Funding is awarded to	SATURANA MDS:(MDS/					
1011 V	00.445	and Reduction Grant Tabai Consonia to	sang www.					
Environmental Protection Agency	00.445	Recisco y Leas in Medica School Conference of the Conference of th	imper imper					
Environmental Protection Agency	66,446	Technical Assistance for The Objective is to	mps / mps/					
Environmental Profection Agency	66.447	(Clean Water Act (CWA) assistance and training Sewer Overflow and The cojective of the	sam g www.					
		Stormwater Reuse CSG Program is to Municipal Grant award grants to the	Sangwww.					
Environmental Protection Agency	66,448	Danlang Water System The purpose of this intrastructure grant program is to thorease canning water	https://https:/					
Environmental Profession Agency	66,454	Infrastructure Precision and Sentanches Ford Water Quelon Management Pastering Social Infrastructure Management Pastering Social Infrastructure Management Pastering Social Infrastructures and the Pastering Description The Management Entirely Description The Management Entirely Description The Management Entirely	into:/ https:/					
Environmental Protection Agency	06,456	territores and the	sang www.					
		National Estuary The National Estuary Program (NEP) goal is to protect and respons	San g www.					
Environmental Protection Agency	00.458	Clean Water State To create State Proving Fund Revolving Funds ISSES Trough A	mps/mps/					
Envisonmental Protection Agency	66.480	Nonpoint Source 15 asset States, the	mps Hips					
		Annual Elaw Partin Valencia Carlo Santa Valencia Ca	sang www.					
Environmental Profection Agency	66.481	Program Development Inbal, and/or local	mps / mps/ / / / san diwww					
Environmental Profection Agency	66,462	National Welland To assist state. Tribal, Program Development territory and/or local	https://thtps:/					
Environmental Protection Agency	00.400	Program Development The Ches apeace Bay is Geographic Programs - The Ches apeace Bay is Geographic Program - The Ches apeace Bay is Geographic	sangww. s mps/mps/					
		Chesapeate Bay a national freasure and Program unique as North	sang www.					
Environmental Protection Agency	06.468	Danking Water State To provide a low-cost, Revolving Fund long-term source of	INDECTINGE/					
Environmental Protection Agency	96 Acry	Georgia pric Programs - The Great Chies	MARI MARO					
Environmental Protection Agency	66.472	Restoration mitrative [GLRii] was trunched in Beach Montonno and To assign Coveras and	sang www.					
		Congress of the Congress of th	Sang www.					
Environmental Protection Agency	66.473	Ored implementation Direct implementation Tabal Cooperative Tabal Cooperative	hibe:/ hibe/					
Environmental Protection Agency	66,475	Geographic Programs 196 06,60146 01176	NACT HIGH					
Environmental Protection Agency	06.461	Program Program, toused within	sangwww.					
		a €" Laite Champiain program is to implement Basin Program the Laite Champiain	f f sangwww.					
Environmental Protection Agency	00.464	Geographic Programs - The EPA South Roada South Florida Program provides	inter/imper					
Environmental Protection Agency	66.485	Support to the Gut The infrastructure	https://https:/					
Environmental Profection Agency	66,486	ACI (Pubic Law 117-58 with the centrality	san g www.					
101.0		Control Program investment and Jobs Grams Class Vi Ad (Public Law 117-56	sang www.					
Environmental Protection Agency	06:487	Support for the suit I her Intradictione Hypotal Action Program of Control Program of Con	NAMES (MIGRO)					
Environmental Protection Agency	00.489	Personne to To assist in responding	Imper/imper					
Environmental Protection Agency	06.490	Pesponse to To assist in responding Emergency Situations to and at earting Affecting Public Walter emergency situations	Sang www.					
100.0		Contest of Excellence To improve the for Stormwider Cornics effectiveness, cost efficiency, and Senior Environmental. To use the falents or	sang www.					
Environmental Protection Agency	66.508	Senor Environmental To use the talents of Emproyment Program Americans 55 years of	https://https:/					
Environmental Profection Agency	66.509	Employment Program Spence To Acheve Pesuits (STAP) Research Program Program Program Program Program Program Program Program Spence to Acheve Progr	upps/ https:/					
Environmental Profession Agency	60.510	Programs goal is to Surveys, Stuties, The Office of Research	sang www.					
		Investigations and and Development Special Purpose Grants (ORD) supports	sangwww.					
Environmental Protection Agency	00.511	Office of Research and The Office of Research Development and Development 4.5 ** Consultative Research (DRD) Consultative						
Environmental Protection Agency	05.516	E3 AWARS NATIONAL THE P3 PROGRAM.	huber, huber					
Environmental Protection Agency	66.518	State Senior To use the talents of	https://https://					
		Environmental Americans 55 years of Employment Program age or older to provide	SAR O WWW.					
Environmental Protection Agency	66.521	Innovative Water The purpose of this Technology Grant program is to accelerat the development and	https://thps:/					
Environmental Protection Agency	66.522	Entanced Aquirer Use The purpose of this and Bechanic Property	mps/mps/					
Environmental Protection agency	60,000	Envanced Acquirer use and Recharge Program program is to carry our growthwater research. Environmental The Ominitial Territore Protection Consociated Ad [CTN] above the	Sang www.					
		Protection Consolicated Act (OTA) allows the Grants for the insular insular Areas to	SIP G WWW.					
Environmental Profession Agency	05.004	Grants for the insular	https://mps/					
Environmental Protection Agency	66.605							
Environmental Protection Agency	66.008	Partnership Grans partnership with the states and Tribes is Environmental The National	sangwww.					
		Environmental The National Processing Proces	sang www.					
Environmental Protection Agency	66.609	Protection of Christian from Environmental leastly Darks	mps/mps/					
Environmental Protection Agency	00.010	Surveys, Statles, The goals of these	Mps. Mps./					
Environmental Protection agency	95.011	investigations and assistance programs Special Purpose Guarts are to: [1] support and innovation-Grams Traggues of this assistance programs are transport and innovation-Grams [1] support frances	SIRI G WWW.					
		and innovation Grants assistance program and to (1) support dialyses	sang www.					
Environmental Protection Agency	66.614	Financial Assistance The objective of this For Community Support program is to provide	mipa"/ impa?					
Environmental Profession Agency	66.615	Environmental Justice The goals of this	sang)www.					
Environmental Protection Agency	60.616	Grammating Program awards for the design	Sang www.					
2.1		Environmental Justice Theory Communities Theory Communities Granting Program (6.1 1471 Mr. 14	SING WWW.					
Environmental Profession Agency	66,700							
Environmental Profection Agency	66.701	Congratated Pestode Entrocement Data agencies Cooperative participating in this Congrative Truck Substances Congratice Monitoring Cooperative Truck Substances Congration Cooperative Cooperative Cooperative Cooperative Co	sangww. mps/mps/					
Environmental Profection Agency	66.707	Congrance Monitoring arogum are to: 1) Cooperative sasts1 Gramees. 1675 TigsTyr mass widostre Strate-unite	sang www.					
		TSCATRE V State Lead Grants Centration of Lead-	sang www.					
Environmental Protection Agency	66.708	Position Prevention The P2 grant program Grants Program was enacted under the	nmps://mps/					
		Polition Prevention Accounts 11 Between	1 Sing www.					

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Environmental Profession agency	00.714	Pesticide Environmental The Stewardship Program proc [PESP] Grants end	objective of this	https://https:/					
Environmental Protection Agency	66.716	Present Ch. Con. Development, supp. Monroring, Public development	ne patricky area to	SINGES HINGES					
Environmental Protection Agency	66.717	Monroring Public devel	goal of the Source	sing www.					
		Source Reduction The Assistance Red	ucton assistance A) program is to	Sangwww.					
Environmental Protection Agency	66.720	PRIA 5: Faith Worker Grain and Hearth Case Supp	nction assistance A) program is to an arrifer lost ris are awarded to poil education.	inter (mpc/					
Environmental Profection Agency	66 721	Provider Training and Oute Reducing Entoded Tre	port education, each, framing, and goal of the sucing timbodied enhouse Gas	BINGET HIGHS					
Environmental Protection agency	66.722	Greenhouse Clas Red Emissions for Gree Pesticide Registration The	enhouse Gas	sam g www.					
		Enprovement Act groot Enprovement act	objective of this pain, required by LE VISC	sang www.					
Environmental Protection Agency	00.801	Hazandous Waste To a Management State gove	ssall State enments in the expension and	sang www. https://thps:/ sang www. https://thps:/					
Environmental Protection Agency	66.802	Program Support devi Supertura State, The Political Subdivision assu	goals of this stancelisting are to conduct site or expension sort states, ones, tribes, or in bal consortal apport serricoles than	https://mps/					
Environmental Protection Agency	66.804	and inclain Title Site-	CONTRACTOR	Sang www.					
		Underground Storage To a Tank (UST) Prevention, Sent Detection, and Inter	tones, tribes, or rin bal consonta	sing www.					
Environmental Profection Agency	66.805	Cesting Underground To's Storage 13.14 Trust Inco	upport state lucing termores that included in the	https://https:/					
Environmental Profection Agency	66.808	Superfund Technical The	etatologica sufficients	https://https:/					
Environmental Profection Agency	66.808	Assistance Grants (TAG) to Community City (Assistance Statistical	ICLA 117 kg as redword by 42 U.S.C. rio mode use of	sangwww.					
Environmental Protection Agency	66.809	Assistance Grants man	grated solid waste agement systems	sang www.					
Eminorita Pros. Ion Agency	00.809	indus Tribe Core the s	statutory are ments of	SAD G WWW					
Environmental Protection Agency	66.812	Hazardous Waste The Management Grant Man	am a spirana i pilit. Hazakkous Waste Vagement Grant	Imper Imper					
Environmental Profession Agency	66.813	Program for Tribes Prog Afternative or innovative 10 s	upport grants and	https://https:/					
Environmental Profection Agency	66.814	Industrials of the industrials of the industrials of the industrial of the industria	1) a program of	sang www.					
	00.514	Research, and prop	ery, the expansion,	/ /					
Environmental Protection Agency	66.815	Brownleids Job Brow Training Cooperative prop	antield sites are real perty, the expansion,	proper (https:/					
Environmental Protection Agency	00.810	Brownieds Job Training Cooperative Agreements and Headquarters and This Regional Underground Strong Stronger Tables Persponse Program poor Graffic Stronger Stronger Tables Brownieds Stronger Stronger Tables Brownieds Stronger Stronger Tables Brownieds Stronger Tables	grant program	imps://imps/					
Environmental Protection Agency	66.817	Storage Tunes Program the I	LUST prevention	sang www.					
	50.017	Response Program prop Grants rede	ert, ite expanson, welopment, or	SIR G WWW.					
Environmental Protection Agency	66,518	stowmens Sitis Multipurpose, prop	amelec Sies Vie lieu verte, the expansion, vercoment or	mps: Hight)					
Environmental Profection Agency	66.820	COMMINGE MAIL PROPERTY OF THE	overall goal of the	https://imps/					
Environmental Profection Agency	66.920	COAL COMBUSTION to po	concernation in the	Sang www. oward ucaso https://https:/					
1011 0		Intrastructure for Pos Pocygling intestructure MAX	Consumer en als Management	sang www.					
Environmental Protection Agency	66.921	Recycling Education gran and Outreach Grants area	cojective of fife of program is to rove the	/ / sangwww.					
Environmental Protection Agency	66.926	Indan Environmental EPA General Assistance Envi	provides indian	mps/mps/					
Environmental Protection Agency	66.931	Program (GAP) Assi	Stance Program Di Reservat sent Office of	sangwww. outst usen imps/imps/					
Environmental Pictection Agency	66.950	Assistance Projects inter- Sponsored by the Office Affai National Environmental The	mational and Tetral its (OrTA) engages	sang www.					
	00 100	Education Training teac Program accomp	pertraining parties to train	/ sangwee.					
Environmental Profession Agency	66.951	Environmental The Education Grants Educ	Environmental Cation Grants	https://https:/					
Environmental Profection Agency	00,900	National Environmental The Education Training Program Program The Education Grants Program The Education Grants Program The Program The Program Progra	overall goal of the	SMEC HIGED					
Environmental Profession Agency	00.907	Greentouse Gas The	peled Airshed Grant pain is to reduce air inflation Reduction	sang www.					
		Greenhouse Gas The Reduction Fund: Act National Chain Ges	inflation Reduction (#A) amends the than ACL to Ingiple	Sang www.					
Environmental Protection Agency	00.908	Water intrastricture To a Finance and inhosation line (WIFIA) nate Greenhouse Clas Yfe	cogerate Strent in our	proper/proper/					
Environmental Protection Agency	66.959	Greenhouse Gas Yre Reduction Fund: Solar Ad-	intation Reduction	hips://mps/					
Environmental Protection Agency	66.960	Greenfouse Gas The Reduction Fund: Green fouse Gas The Reduction Fund: Clean Act Communities	ct to include son that are used initiation Reduction	Sam g www. outsit issets https://https:/					
Environmental Protection Agency	00.901	Reduction Fund: Clean Act	amends the Clean scholandude	Sangwww.					
		Superfund State and indian Table Combined Coperative reg. Geographic Programs - Columbia River (sain pick pick page (GHBH) reg.	statutory are ments of	sang www.					
Environmental Profession Agency	66.962	Geographic Programs - To s Columbia River Basin prob	upport the ection and	mps/mps/					
Environmental Protection agency	00.964	Geographic Programs - The Chesapeate Ref	Chesapeaxe Bay is	Sattle Manny					
Environmental Profection Agency	66.965	Geographic Programs - The Chesapease Brig and Program uniq	ue as North gress appropriated	sang www. Imps/ imps/					
		CLAIMS SETTLEMENT YES	12023 to LEPA to	sang www.					
Equal Employment Opportunity Commission	30 005	Employment a) To Discontribution Private who Bair Program with	assist individuals have filed a charge the Commission, or	sang www.					
Executive Office of the President	95 001	High intensity Drug 10 H Transching Aleas trans	educe drug icong and drug	imper/miper					
Executive Office of the President	95 903								
Executive Office of the President	95,004	DFC NATIONAL PRICE ANTI-DELUG PRICE ANTI-DELUG PRICE CIUI CON	Connunes	Sang wew					
	80,004	CN (CN	pControl Policy DCP), Executive	sang www.					
Executive Office of the President	95 00 5	Technical Assistance supp	Administration ports a combined	mps/mps/					
Executive Office of the President	95 008	Model Acts Program The	purpose of the	mps/mps/					
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JS 44 (Rev. 03/24) **Z25 C1:021.52 CPNR9 Document of the Control of Carlos *

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the

purpose of initiating the civil do				DRM.)		and for the use of		
I. (a) PLAINTIFFS				DEFENDANTS				
State of New York, et al.				Donald Trump, et al.				
(b) County of Residence of First Listed Plaintiff New York (EXCEPT IN U.S. PLAINTIFF CASES)				County of Resider		_	DATE V	
				(IN U.S. PLAINTIFF CASES ONLY) NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.				
(c) Attorneys (Firm Name, Address, and Telephone Number)				Attorneys (If Know	wn)			
	fice of Attorney Gen Street, Providence,							
II. BASIS OF JURISD			III CI	CIZENSHIP OF	PRINCIP	AL PARTIES	Place an "X" in One Box for Plaintiff	
				(For Diversity Cases On	nly)	а	and One Box for Defendant)	
U.S. Government Plaintiff	U.S. Government Not a Party)		Citize	n of This State	PTF DEF			
2 U.S. Government Defendant	Defendant (Indicate Citizenship of Parties in Item III)		Citize	n of Another State	_ 2 2	2 Incorporated and P of Business In A		
				n or Subject of a reign Country	3 3	B Foreign Nation	6 6	
IV. NATURE OF SUIT	(Place an "X" in One Box On		FO				Suit Code Descriptions.	
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120 Marine 130 Miller Act	310 Airplane 315 Airplane Product	365 Personal Injury - Product Liability		of Property 21 USC 88	81 🔲 423 W	ithdrawal B USC 157	376 Qui Tam (31 USC 3729(a))	
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150 Recovery of Overpayment & Enforcement of Judgment	320 Assault, Libel & Slander	Pharmaceutical Personal Injury				PERTY RIGHTS opyrights	410 Antitrust 430 Banks and Banking	
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195 Contract Product Liability	360 Other Personal	Property Damage		Relations	861 H	IA (1395ff)	490 Cable/Sat TV	
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210 Land Condemnation	440 Other Civil Rights	Habeas Corpus:		1 Employee Retirement	803 K.	SI (403(g))	891 Agricultural Acts 893 Environmental Matters	
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245 Tort Product Liability 290 All Other Real Property	Accommodations 445 Amer. w/Disabilities -	530 General 535 Death Penalty		IMMIGRATION		S—Third Party 6 USC 7609	* 899 Administrative Procedure Act/Review or Appeal of	
	Employment	Other:		2 Naturalization Applica	ation		Agency Decision	
	446 Amer. w/Disabilities - Other	540 Mandamus & Othe 550 Civil Rights	r H40	5 Other Immigration Actions			950 Constitutionality of State Statutes	
	448 Education	555 Prison Condition 560 Civil Detainee -						
		Conditions of Confinement						
V. ORIGIN (Place an "X" is	n One Box Only)	Commement					<u>I</u>	
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	5 USC 702: 5 USC 706	ute under which you are	e filing (L	o not cite jurisdictional	l statutes unless	diversity):		
VI. CAUSE OF ACTION	Brief description of car APA, Constitutional Cla	ıse:						
VII. REQUESTED IN CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.		D	EMAND \$	AAND S CHECK YES only if demanded in complaint: JURY DEMAND: Yes No				
VIII. RELATED CASE IF ANY	(See instructions):	JUDGE			DOCI	KET NUMBER		
DATE		SIGNATURE OF ATT	ORNEY C	F RECORD				
Jan 28, 2025		/s/ Sarah Rice						
FOR OFFICE USE ONLY								
RECEIPT # AM	MOUNT	APPLYING IFP		JUDGE	E	MAG. JUI)GE	

П.

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- Plaintiffs-Defendants. Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
- County of Residence. For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
- Attorneys. Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".

Jurisdiction. The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X"

- in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below. United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here. United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box. Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked. Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; NOTE: federal question actions take precedence over diversity cases.)
- III. Residence (citizenship) of Principal Parties. This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit. Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: Nature of Suit Code Descriptions.
- Origin. Place an "X" in one of the seven boxes. \mathbf{V}
 - Original Proceedings. (1) Cases which originate in the United States district courts.

Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441. Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing

Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date. Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.

Multidistrict Litigation - Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.

Multidistrict Litigation - Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket. PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7. Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.

- VI. Cause of Action. Report the civil statute directly related to the cause of action and give a brief description of the cause. Do not cite jurisdictional statutes unless diversity. Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service.
- Requested in Complaint. Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P. VII. Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction. Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases. This section of the JS 44 is used to reference related cases, if any. If there are related cases, insert the docket numbers and the corresponding judge names for such cases.

Date and Attorney Signature. Date and sign the civil cover sheet.

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF RHODE ISLAND

STATE OF NEW YORK; STATE OF
CALIFORNIA; STATE OF ILLINOIS; STATE OF
RHODE ISLAND; STATE OF NEW JERSEY;
COMMONWEALTH OF MASSACHUSETTS;
STATE OF ARIZONA; STATE OF COLORADO;
STATE OF CONNECTICUT; STATE OF
DELAWARE; THE DISTRICT OF COLUMBIA;
STATE OF HAWAI'I; STATE OF MAINE; STATE
OF MARYLAND; STATE OF MICHIGAN; STATE
OF MINNESOTA; STATE OF NEVADA; STATE
OF NORTH CAROLINA; STATE OF NEW
MEXICO; STATE OF OREGON; STATE OF
VERMONT; STATE OF WASHINGTON; STATE
OF WISCONSIN,

Plaintiffs,

V.

DONALD TRUMP, IN HIS OFFICIAL CAPACITY AS PRESIDENT OF THE UNITED STATES; U.S. OFFICE OF MANAGEMENT AND BUDGET; MATTHEW J. VAETH, IN HIS OFFICIAL CAPACITY AS ACTING DIRECTOR OF THE U.S. OFFICE OF MANAGEMENT AND BUDGET; U.S. DEPARTMENT OF THE TREASURY; SCOTT BESSENT, IN HIS OFFICIAL CAPACITY AS SECRETARY OF THE TREASURY; PATRICIA COLLINS IN HER OFFICIAL CAPACITY AS TREASURER OF THE U.S.; U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES; DOROTHY A. FINK, M.D., IN HER OFFICIAL CAPACITY AS ACTING SECRETARY OF HEALTH AND HUMAN SERVICES; U.S. DEPARTMENT OF EDUCATION; DENISE CARTER, IN HER OFFICIAL CAPACITY AS ACTING SECRETARY OF EDUCATION; U.S. FEDERAL EMERGENCY MANAGEMENT AGENCY; CAMERON HAMILTON, IN HIS OFFICIAL CAPACITY AS ACTING ADMINISTRATOR OF THE U.S. FEDERAL EMERGENCY MANAGEMENT

C.A. No. 1:25-cv-00039

REQUEST FOR EMERGENCY TEMPORARY RESTRAINING ORDER UNDER FEDERAL RULE OF CIVIL PROCEDURE 65(B)

AGENCY; U.S. DEPARTMENT OF TRANSPORTATION; JUDITH KALETA, IN HER OFFICIAL CAPACITY AS ACTING SECRETARY OF TRANSPORTATION; U.S. DEPARTMENT OF LABOR; VINCE MICONE, IN HIS OFFICIAL CAPACITY AS ACTING SECRETARY OF LABOR; U.S. DEPARTMENT OF ENERGY; INGRID KOLB, IN HER OFFICIAL CAPACITY AS ACTING SECRETARY OF THE U.S. DEPARTMENT OF ENERGY; U.S. ENVIRONMENTAL PROTECTION AGENCY; JAMES PAYNE, IN HIS OFFICIAL CAPACITY AS ACTING ADMINISTRATOR OF THE U.S. ENVIRONMENTAL PROTECTION AGENCY: U.S. DEPARTMENT OF HOMELAND SECURITY; KRISTI NOEM, IN HER CAPACITY AS SECRETARY OF THE U.S. DEPARTMENT OF HOMELAND SECURITY; U.S. DEPARTMENT OF JUSTICE; JAMES R. McHENRY III. IN HIS OFFICIAL CAPACITY AS ACTING ATTORNEY GENERAL OF THE U.S. DEPARTMENT OF JUSTICE; THE NATIONAL SCIENCE FOUNDATION and DR. SETHURAMAN PANCHANATHAN, IN HIS CAPACITY AS DIRECTOR OF THE NATIONAL SCIENCE FOUNDATION,

Defendants.

MOTION FOR A TEMPORARY RESTRAINING ORDER

Pursuant to Federal Rule of Civil Procedure 65, Plaintiff States move for issuance of an order temporarily restraining Defendants from enforcing the directive given to all Federal agencies in the Office of Management and Budget's January 27, 2025 Directive to "temporarily pause all activities related to obligation or disbursement of all Federal financial assistance, and other relevant agency activities that may be implicated by [certain] executive orders" pending the Court's review of the merits. Matthew J. Vaeth, Acting Director of the Office of Management and

Budget, "Temporary Pause of Agency Grant, Loan, and Other Financial Assistance Programs" (January 27, 2025) ("OMB Directive"), at 2.

The OMB Directive's directive to "pause . . . disbursement of Federal funds under all open awards," and to "pause" other Federal financial assistance-related activities is unlawful under the Administrative Procedure Act ("APA") because it is arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with law, contrary to constitutional right or power, in excess of statutory jurisdiction, authority, or limitations, and is contrary to law. See 5 U.S.C. § 706. The OMB Directive also violates constitutional Separation of Powers principles and exceeds the constitutional limitations on any Spending Clause power that Congress might have delegated to the executive branch in any of the activity areas affected by the "pause." The OMB Directive's "pause" mandate is causing Plaintiff States immediate and irreparable harm—in the form of millions of dollars in obligated funds and mass regulatory chaos—every day that the policy set out in the OMB Directive is in effect. The balance of the equities also weighs overwhelmingly in Plaintiffs' favor. Plaintiff States thus respectfully request that this Court schedule a hearing on this matter today, January 28, 2025, or as soon as is otherwise practicable, and that the Court restrain the Defendants from enforcing the OMB Directive's directive to "pause all activities related to obligation or disbursement of all Federal financial assistance." OMB Directive at 2.

¹ Indeed, Defendants essentially acknowledged in a separate filing that a TRO would be appropriate if payments under particular grant programs have been delayed and that such delay would cause harm meriting immediate relief—which this record, with declarations from dozens of state officials indicating just that—amply demonstrates. Def.'s Notice Regarding Pls' Mot. for TRO, *Nat'l Council of Nonprofits v. OMB*, No. 25-cv-239 Dkt. 11 at 2 (D.D.C. Jan. 28, 2025).

BACKGROUND

Last night, Plaintiff States became aware through social media reporting, later confirmed by the Washington Post,² that the Acting Director of the Office of Management and Budget, Matthew Vaeth, had sent a sweeping Directive to heads of executive departments and agencies that will upend the regular workings of State government programs providing health care, safe roads, disaster assistance, and other essential services. The OMB Directive has already caused mass uncertainty and confusion for recipients of Federal funds who are not sure when or if they will receive funding already obligated. The OMB Directive addresses "Federal financial assistance," a broad designation under Federal law that encompasses most Federal grants and loans—the Directive itself claims that \$3 trillion of FY 2024 Federal government spending is comprised of Federal financial assistance. OMB Directive, at 1.

Complicating matters further, instead of communicating through normal procedural channels to explain changes in the complex Federal grant and loan programs each Federal executive branch agency is charged with administering, Director Vaeth issued the OMB Directive as a non-publicized internal memorandum dictating that all agencies "must temporarily pause all activities related to obligation or disbursement of all Federal financial assistance" *Id.* at 2. The memorandum further cryptically explains that the financial activities subject to the pause include, but are not limited to, "financial assistance for foreign aid, nongovernmental organizations, DEI, woke gender ideology, and the green new deal." *Id.* And, while the OMB Directive specifically mentions seven executive orders that by their own terms purport to limit

² Jeff Stein, Jacob Bogage, and Emily Davies, "White House pauses all federal grants, sparking confusion," Washington Post, Jan. 27, 2025, https://www.washingtonpost.com/business/2025/01/27/white-house-pauses-federal-grants/.

Federal financial assistance or at least appear to begin a process at interrupting Federal financial assistance,³ it is unclear if these are the only policies to which the memo applies. *Id.* at 1-2.

The OMB Directive sketches out a process by which each executive branch agency "must complete a comprehensive analysis" of their programs, the purpose of which is to allow the Administration to "review agency programs and determine the best uses of the funding for those programs consistent with the law and the President's priorities." *Id.* at 2. But, while that happens, the Directive asserts that "all activities related to obligation or disbursement of all Federal financial assistance" must be paused. *Id.* at 2. And while the order describes the pause as temporary, there is no set end date. Agencies must submit a detailed report by February 10, 2025, but there is no deadline for OMB to make a determination and resume funding. *Id.* While waiting for that determination to be made, "[e]ach agency must pause: (i) issuance of new awards; (ii) disbursement of Federal funds under all open awards; and (iii) other relevant agency actions that may be implicated by the executive orders, to the extent permissible by law" *Id.*

State Plaintiffs rely on Federal financial assistance to provide basic services to their residents. In FY 2024, Federal grants to States surpassed \$1 trillion.⁴

Billions of dollars flow to State health systems, infrastructure, law enforcement, education, and everything in between. Many States are faced with the possibility of immediate cash shortfalls

³ The referenced executive orders are: Protecting the American People Against Invasion (Jan. 20, 2025), Reevaluating and Realigning United States Foreign Aid (Jan. 20, 2025), Putting America First in International Environmental Agreements (Jan. 20, 2025), Unleashing American Energy (Jan. 20, 2025), Ending Radical and Wasteful Government DEI Programs and Preferencing (Jan. 20, 2025), Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government (Jan. 20, 2025), and Enforcing the Hyde Amendment (Jan. 24, 2025). Id. at 1-2.

⁴ Rebecca Thiess, Kate Watkins, and Justin Theal, "Record Federal Grants to States Keep Federal Share of State Budgets High," Pew, Sept. 10, 2024, https://www.pewtrusts.org/en/research-and-analysis/articles/2024/09/10/record-federal-grants-to-states-keep-federal-share-of-state-budgets-high.

to conduct their basic everyday programs like funding for healthcare and food for children, which are and have been conducted through cooperative federalism arrangements enacted by Congress and in place for decades, and to address their most pressing emergency needs. *See* Affirmation of Keith D. Hoffman dated January 28, 2025 ("Hoffmann Aff.") at ¶¶3-31 (citing exhibits A-DD in support); Compl. ¶¶ 77-97. This will result in immediate and devastating consequences for the people of Plaintiff States. California is in particularly dire straits given the uncertainty imposed by the Department of Justice Memorandum on continued disbursement of Federal Emergency Management Agency ("FEMA") funding that is essential to the response to wildfires. Compl. ¶80. Many of these grants are distributed according to statutory formulas such that Congress did not leave discretion to agencies to determine qualification to begin with.

In short, funding making up billions of dollars in each of Plaintiff States has been cast aside regardless of the chaos this will cause or the impact on essential functions Americans need in their daily lives.

ARGUMENT

The legal standard for a temporary restraining order "mirrors that for a preliminary injunction." *Schnitzer Steel Industries, Inc. v. Dingman*, 639 F. Supp. 3d 222, 226 (D.R.I. 2022) (citing *Harris v. Wall*, 217 F. Supp. 3d 541, 552 (D.R.I. 2016)). Under that standard, "[t]he district court must consider 'the movant's likelihood of success on the merits; whether and to what extent the movant will suffer irreparable harm in the absence of preliminary injunctive relief; the balance of relative hardships [and equities]; and the effect, if any, that either a preliminary injunction or the absence of one will have on the public interest." *U.S. Ghost Adventures, LLC v. Miss Lizzie's Coffee LLC*, 121 F.4th 339, 347 (1st Cir. 2024) (quoting *Ryan v. U.S. Immigration and Customs Enforcement*, 974 F.3d 9, 18 (1st Cir. 2020)); *see Winter v. Nat. Res. Def. Council, Inc.*, 555 U.S.

7, 20 (2008). The final two factors—the balance of equities and the public interest—"merge when the Government is the opposing party." *Nken v. Holder*, 556 U.S. 418, 435 (2009). "Likelihood of success is the main bearing wall of the four-factor framework." *Ross-Simons of Warwick, Inc. v. Baccarat, Inc.*, 102 F.3d 12, 16 (1st Cir. 1996). However, a "district court is required only to make an estimation of likelihood of success and need not predict the eventual outcome on the merits with absolute assurance." *Schnitzer Steel Industries, Inc.*, 639 F. Supp. 3d at 226 (quoting *Corp. Techs., Inc. v. Harnett*, 731 F.3d 6, 10 (1st Cir. 2013)).

I. Plaintiff States Have Standing to Challenge the OMB Directive.

Plaintiff States risk losing billions of dollars of funding obligated to them by the Federal government, and for this reason, they easily meet the standard for Article III standing.

"To ensure the proper adversarial presentation *Lujan* holds that a litigant must demonstrate that it has suffered a concrete and particularized injury that is either actual or imminent, that the injury is fairly traceable to the defendant, and that it is likely that a favorable decision will redress that injury." *Massachusetts v. EPA*, 549 U.S. 497, 517 (2007) (citing *Lujan v. Defs. of Wildlife*, 504 U.S. 555, 560–61 (1992)). "Monetary costs are of course an injury." *United States v. Texas*, 599 U.S. 670, 676 (2023). Thus, "los[ing] out on federal funds . . . is a sufficiently concrete and imminent injury to satisfy Article III." *Dep't of Com. v. New York*, 588 U.S. 752, 767 (2019).

Because the OMB Directive threatens to pause large amounts of Federal funding to the Plaintiff States on less than 24 hours' notice, the Plaintiff States meet these requirements. The injury could hardly be more severe: Plaintiff California faces the prospect of losing disaster relief funds at a moment of great need, as the Los Angeles area is recovering from devastating wildfires; Plaintiff States risk losing funding that they receive from the Federal government to provide school lunches to children from low-income families, grants to help law enforcement combat violence

against children, elders, and other vulnerable populations, and funds for highways and other essential infrastructure. Compl. ¶¶ 14, 30, 82, 90. In short, each of the Plaintiff States faces immediate, direct pocketbook losses.

Moreover, because the OMB Directive was issued to agency heads on less than 24 hours' notice, the Plaintiff States have had no time to prepare for this drastic move by the Federal government. Had the proposal given several weeks' or months' notice, the Plaintiff States could have consulted with their budgetary personnel to devise a plan to address any potential pause in funding. Compl. ¶¶ 95-97. As it is, they had no notice and thus no ability to set aside funding for the anticipated shortfall, work with their legislatures to appropriate funds, or take other similar measures. *Id.*

The OMB Directive's Federal financial assistance "pause" mandate is also causing a present harm to Plaintiff States' ability to engage in budgeting and financial planning.

As for traceability and redressability, the Defendants are the sole cause of this mayhem—there is no other party that these injuries could be traced to. And the injunctive relief Plaintiff States seek will prevent the Federal government from following through on its unlawful directive.

II. Plaintiff States Are Likely to Succeed on the Merits

Plaintiff States are likely to succeed on the merits of their claims. *First*, Defendants' actions violate the APA because they are acting *ultra vires*: Congress has not delegated any unilateral authority to Defendants to indefinitely pause all Federal financial assistance under any circumstance, irrespective of the specific Federal statutes and contractual terms governing particular grants, and without even considering those statutory and contractual terms. The OMB Directive's categorical and sweeping command cannot be squared with the complex statutory regime governing Federal grants and, specifically, the many Federal statutes requiring the Executive to provide grant funding to recipients under particular statutory provisions and formulas.

Second, the OMB Directive is arbitrary and capricious in multiple respects, including that it "entirely fail[s] to consider . . . important aspect[s] of the problem," Motor Vehicle Mfrs. Ass'n of U.S., Inc. v. State Farm Mut. Auto. Ins. Co., 463 U.S. 29, 43 (1983), namely the significant harms imposed on grant recipients (including Plaintiff States) by an abrupt termination of nearly all Federal funding. There is also a sweeping gulf between the purported basis for the OMB Directive (President Trump's recent executive orders directing agencies to consider terminating programs in a handful of discrete policy areas) and what it actually does, which is to imperil billions of dollars in Federal funding without regard to what the funding supports, the statutory scheme authorizing it, or whether it has any connection to the recent executive orders. The OMB Directive also does not consider any alternatives—for instance, conducting its "review" absent a pause in Federal funds, or pausing only grants and other Federal financial assistance where it has some power to act.

Moreover, by purporting to terminate Federal funds on 24 hours' notice, the OMB Directive effectively renders illusory (1) its direction that funding be halted only "to the extent permissible by law" and (2) its statement that "OMB may grant exceptions allowing Federal agencies to issue new awards or take other actions on a case-by-case basis." The OMB Directive provides no time for Federal agencies either to make supported requests for case-by-case exceptions to the memo's directives or to assess adequately whether halting particular grants would or would not be permissible under law. Even with more time, it is unclear whether it would be possible to assess whether the law permits any funding to be halted in response the President's Executive Orders where the Executive Orders themselves may be contrary to law.

Indeed, the OMB Directive does not identify *any* reasoned explanation for the decision to halt all Federal funding to grant recipients, across the board and indefinitely, much less one that

could justify such an extreme and reckless policy. And Defendants are not even attempting to clearly limit the spending "pause" to only some subset of Federal financial assistance as to which they determine that they have lawful authority to order the pause, because the pause is mandated to take effect at 5:00 p.m. on the day after it was issued and actually began even sooner—this morning. Defendants are thus acting with full knowledge that, as to many of the funding disbursements it is pausing indefinitely, the Executive has no lawful authority to hold back the funding, because Congress has tied its hands or because the terms of the grants—which States reviewed and accepted—do not authorize any such pause.

Third, implementing the OMB Directive Federal funding freeze will violate separation of powers principles. "The United States Constitution exclusively grants the power of the purse to Congress, not the President," City & Cnty. of San Francisco v. Trump, 897 F.3d 1225, 1231 (9th Cir. 2018), with the executive branch possessing only such authority in relation to Federal funding that Congress has chosen to give it. Congress has not given the Executive limitless power to "pause" all Federal financial assistance—including funds that Congress has expressly directed to specific recipients and purposes—while the Executive tries to figure out where it might have some authority to renege on its funding commitments, let alone to pause all Federal financial assistance indefinitely.

Fourth, even if the Executive had some power to suspend disbursements in some areas affected by the OMB Directive's instruction, it still would not have power to retroactively impose a new term on already agreed upon Federal financial assistance to Plaintiff States—the new term being that the Executive retains a right to pause already-awarded funding midstream, indefinitely, while it decides whether or not it still wants to fund the grant-funded activities. Plaintiff States are entitled to know the terms of the funding agreement before they enter into it. Plaintiff States are

not currently aware of grant terms that would allow an indefinite, unsubstantiated, across-the-board freeze of all funds—let alone the type of clear terms that would be required to put the States on notice, before they accepted the many Federal grants implicated by the OMB Directive, that these Federal funds could be frozen based solely on the Executive's unilateral whims. And to the extent the OMB Directive is attaching new, retroactive conditions on Federal funding recipients' receipt of Federal funds—or pausing Federal funding so it can decide whether to try to impose such new conditions—it is plainly in violation of the limitations on any spending power it might have.

Plaintiff States are thus highly likely to succeed on their claims that the OMB Directive is arbitrary and capricious and contrary to law, that agencies halting all disbursement of Federal funds pursuant to the OMB Directive are acting *ultra vires*, and that the executive branch—and the President—are violating separation of powers principles.

A. The OMB Directive Is Contrary to Law and *Ultra Vires* (Count I)

It is black-letter law that, in the appropriations context, "the President must follow statutory mandates so long as there is appropriated money available." *In re Aiken Cnty.*, 725 F.3d 255, 259 (D.C. Cir. 2013) (Kavanaugh, J.); *accord, e.g., City & Cnty. of San Francisco*, 897 F.3d at 1232 ("[T]he President is without authority to thwart congressional will by canceling appropriations passed by Congress."). The Executive cannot simply "decline to follow a statutory mandate or prohibition simply because of policy objections." *Aiken Cnty.*, 725 F.3d at 259. But the OMB

⁵ The OMB Directive constitutes final agency action subject to the APA. Final agency actions "mark the consummation of the agency's decisionmaking process" and are those "by which rights or obligations have been determined, or from which legal consequences will flow." *Bennett v. Spear*, 520 U.S. 154, 177-78 (1997) (internal citation and quotation marks omitted). The OMB Directive is a final agency action because it is a final order directing all agencies to immediately "pause all activities related to obligation or disbursement of all Federal financial assistance." OMB Directive, at 2.

Directive purports to do just that, instructing agencies to "pause" trillions of dollars in Federal funding that Congress has directed the executive branch to spend—and, in many cases, that the agencies have formally obligated to grant recipients under specific terms—simply because such funds are not, in its view, "align[ed] . . . with the will of the American people as expressed through Presidential priorities." OMB Directive, at 1.

The OMB Directive identifies no legal authority for such an action, and there is none: no Federal law authorizes the President to unilaterally halt all disbursements of all Federal funds to all funding recipients, no matter the authorizing or appropriating statute, the regulatory regime, or the terms and conditions of the grant itself. *See Aiken Cnty.*, 725 F.3d at 261 n.1 (explaining that the executive branch and its officers, including the President, do "not have unilateral authority to refuse to spend" funds that have been appropriated by Congress "for a particular project or program"). To the contrary, when the President wants "to spend less that the full amount appropriated by Congress" he must comport with the specific procedural requirements set forth in the Impoundment Control Act, 2 U.S.C. §§ 681 *et seq.*; *see also Aiken Cnty.*, 725 F.3d at 261 n.1, citing 2 U.S.C. § 683 (requiring budget authority proposed for rescission to be made available for obligation until "Congress has completed action on a rescission bill[.]"). Even a temporary "pause" of budget authority by the OMB requires compliance with the ICA. 2 U.S.C. § 684 (requiring proposed deferrals to be transmitted via a "special message" to Congress).

Indeed, Federal appropriations law is complex and nuanced, and it cannot be squared with the OMB Directive's reckless sweep. Many of the most significant funding streams to the States, for instance, take the form of categorical or "formula" grants, which Congress has instructed the Executive to provide to States on the basis of enumerated statutory factors, such as population or the expenditure of qualifying State funds. *See, e.g., City of Los Angeles v. Barr*, 941 F.3d 931, 934-

35 (9th Cir. 2019) (describing the statutory factors determining eligibility for specific formula grant); City of Philadelphia v. Att'y Gen. of United States, 916 F.3d 276, 280 (3d Cir. 2019) (same). Congress, for instance, has instructed the Department of Education to fund elementary and secondary education in the States by reference to specific formulas that encompass total population and the population of disadvantaged children, among other factors. 20 U.S.C. § 6303; see Rebecca R. Skinner, Cong. Rsch. Serv., R47702, ESEA Title I-A Formulas: A Primer (2023), available at http://bit.ly/4ha5W52. But the funding statute does not confer authority on the Department (or anyone else) to indefinitely halt elementary and secondary education grants to the States simply because such grants are not "align[ed] . . . with the will of the American people," OMB Directive, at 1, as the OMB Directive instructs it to do.

The same is true of many other Federal funds that Congress has required the Executive to provide to the States (and other grantees), but which the OMB Directive purports to indefinitely suspend. Congress has required the Secretary of Health and Human Services to reimburse States for a fixed portion of their Medicaid expenditures, 42 U.S.C. § 1396b(a) (outlining that the HHS Secretary "shall pay to each State" amount set by statute), an amount totaling over \$800 billion annually, U.S. Dep't of Health & Human Servs., Centers for Medicare & Medicaid Servs., NHE Fact Sheet, https://bit.ly/42xCy4i (last updated Dec. 18, 2024). But Congress did not authorize the Acting Secretary to indefinitely suspend such payments "simply because of policy objections," Aiken Cnty., 725 F.3d at 259, as the OMB Directive instructs. Likewise, Congress has established a statutory formula by which the Secretary of Transportation is required to distribute Federal highway funds to States, 23 U.S.C. § 104(c), an amount totaling approximately \$60 billion annually, U.S. Dep't of Transp., Fed. Highway Admin., State-by-State Federal Aid Highway Program Apportionments, available at https://bit.ly/3WBmpXC. But Congress did not authorize

that such funds do not "advanc[e] Administration priorities," as the OMB Directive so instructs. At bottom, the OMB Directive appears to suggest that the Executive can unilaterally suspend the payment of Federal funds to the States at any time simply by choosing to do so, no matter the authorizing or appropriating statute, the regulatory regime, or the terms and conditions of the grant itself. That is not the law.

B. The OMB Directive Is Arbitrary and Capricious (Count II)

Plaintiff States are also highly likely to succeed on their claim that the OMB Directive is arbitrary and capricious in multiple respects.

First, the OMB Directive is arbitrary and capricious on its face because it "entirely fail[s] to consider . . . important aspect[s] of the problem," *State Farm*, 463 U.S. at 43, principally the profound harms worked on the States and their residents by the abrupt halt in Federal funding and the significant reliance interests that States have developed in connection with the Federal funds to which they are entitled by law. It is a basic rule of administrative law that an agency must "pay[] attention to the advantages *and* the disadvantages of [its] decisions." *Michigan v. EPA*, 576 U.S. 743, 753 (2015). But the OMB Directive reflects no consideration of the extraordinary harm that its policy will impose on the States and their residents. The OMB Directive threatens Plaintiff States' ability to perform these essential activities—and it does so without any evidence that it considered the enormous costs of its abrupt policy change. Because Defendants "should have considered those matters but did not," their "failure was arbitrary and capricious in violation of the APA." *Dep't of Homeland Sec. v. Regents of the Univ. of Cal.*, 591 U.S. 1, 33 (2020).

Likewise, the OMB Directive does not reflect any consideration of the "serious reliance interests" that Plaintiff States and their residents have developed on the Federal funds to which they were legally entitled, and the consequences of withdrawing those funds with little or no notice.